

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

KRISTIN MARTONIK,	:
	:
Plaintiff,	:
	:
v.	:
	:
UNITED OF OMAHA LIFE	:
INSURANCE COMPANY,	:
	:
Defendant.	:
	:

JOINT MOTION FOR EXTENSION OF DISPOSITIVE MOTION DEADLINES

COME NOW, Plaintiff, Kristin Martonik by and through her counsel Lawrence Chaban, Esquire and Defendant, Untiled of Omaha Life Insurance Company respectfully requesting an extension of the dispositive motion filing deadlines and aver as follows:

1. The following Case Management Conference in this ERISA matter took place on March 27, 2018 and the following dispositive motion deadlines were set:

- a. Dispositive Motions with Brief due: September 28, 2018;
- b. Responses due: October 19, 2018.

See Docket No. 13.

2. After conferring, the undersigned counsel have agreed to seek leave of the Court for an extension of time to file dispositive motions in this matter which will ultimately be decided via cross-motions for summary judgment on a closed administrative record.

3. The undersigned counsel propose the following revised dates for dispositive motions with additional time for the response in light of the Thanksgiving holiday:

- a. Dispositive Motions with Brief due: November 9, 2018;
- b. Responses due: December 9, 2018.

4. No other deadlines are affected by the extension.

WHEREFORE the Parties respectfully request the Court issue an order in the form attached.

/s/Lawrence R. Chaban
Lawrence R. Chaban, Esquire
Alpern Schubert, PC
310 Grant Street
2727 Grant Building
Pittsburgh, Pennsylvania 15219
412.765.1888
Attorneys for Plaintiff,
Kristin Martonik

/s/Salvatore A. Clemente
Salvatore A. Clemente, Esquire
Wilson Elser Moskowitz Edelman & Dicker
Two Commerce Square
2001 Market Street, Suite 3100
Philadelphia, PA 19103
(215) 627-6900/ (215) 627-2665(f)
Attorneys for Defendant,
United of Omaha Life Insurance Company